

C. Anthony Hughes SBN: 250998

Hughes Financial Law
1395 Garden Highway, Suite 150
Sacramento, CA 95833
Ph: (916) 485-1111
Fax: (916) 720-0255
E-mail: attorney@4851111.com

Attorney for Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

The Debtor in Possession, 6056 SYCAMORE TERRACE, LLC through C. Anthony Hughes, Esq., hereby applies to the Court for authorization to employ SAM TOOLOEE to market, lease and provide property management services for the real estate property located at 6056 Sycamore Terrace, Pleasanton, California, 94566.

6056 SYCAMORE TERRACE, LCC the Debtor in Possession herein, declares as follows:

1. The Debtor commenced this Chapter 11 case by filing a voluntary petition under Chapter 11 of 11 U.S.C. § 101 *et seq.* on November 14, 2013.

2. The Debtor manages their financial affairs as pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

3. The Debtor require the service of SAM TOOLOEE to market and lease the real estate property.

4. The Debtor request that the Court authorize SAM TOOLOEE as the Realtor to provide services associated with marketing, leasing and management of the real estate.

5. SAM TOOLOEE does not have any connection with any insider of the Debtors or any insider of an insider of the Debtors.

6. SAM TOOLOEE does not hold or represent any interest adverse to the Debtors or the bankruptcy estate.

7. SAM TOOLOEE does not have a pre-petition claim against the Debtors or the bankruptcy estate. SAM TOOLOEE is not a creditor or an equity security holder of the Debtors or the bankruptcy estate.

8. SAM TOOLOEE is not and was not, within 2 years before the date of the filing of the petition, a director, officer, or employee of the Debtors.

9. As set forth in the Declaration of SAM TOOLOEE, he does not hold or represent any interest materially adverse to the Debtor or the bankruptcy estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason, and SAM TOOLOEE is a "disinterested person" as defined in the Bankruptcy Code § 101(14).

10. All terms of the lease including compensation of real estate professionals and other professionals are subject to court approval after notice and a hearing.

WHEREFORE, the Debtor request the entry of an order authorizing them to employ and retain SAM TOOLOEE to act as a Realtor for the Debtors to market, lease and manage the above stated property.

Dated: December 27, 2013

By: /s/ C. Anthony Hughes
C. Anthony Hughes
Attorney for Debtor

VERIFICATION

Hossein F. Bozorgzad is the managing member of the Debtor in Possession in the above captioned case. I have read the above application to employ SAM TOOLOEE as Realtor and know the contents thereof. I certify that the facts stated above are true to the best of my knowledge.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: 12/24/2013

By: Hossein F. Bozorgzad
Managing Member of Debtor